

IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF PENNSYLVANIA

RICKEY A. BECHTEL
Plaintiff,

v.

DANIEL A. VIRTUE, Business Agent
Of the International Brotherhood of
Teamsters; INTERNATIONAL
BROTHERHOOD OF TEAMSTERS;
LOCAL 776, INTERNATIONAL
BROTHERHOOD OF TEAMSTERS;
ABF FREIGHT SYSTEM, INC.
Defendants

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No. 1:01-CV-789

Judge Sylvia H. Rambo

PLAINTIFF'S OBJECTION TO DEFENDANT'S BILL OF COSTS

Plaintiff, Rickey A. Bechtel, by and through his attorney ROBERT S. MIRIN,
hereby objects to Defendant's Bill of Costs and in support avers as follows:

1. Defendants are not entitled to costs for copying associated with pretrial motions because Defendants did not provide a specific designation of the documents reproduced.
2. Plaintiff brought his civil rights suit in good faith, and as such, the Court should exercise its discretion under Rule 54(d) of the Federal Rules of Civil Procedure so that the statute is not used to punish a non-prevailing party.
3. Plaintiff incurred similar costs in the prosecution of his case.

WHEREFORE, Plaintiff respectfully submits that Defendant's Bill of Costs be denied.

Respectfully Submitted:

/s/ Robert S. Mirin
Robert S. Mirin
Attorney ID No. 25305
2515 N. Front Street
Harrisburg, PA 17110
(717) 909-9900

CERTIFICATE OF SERVICE

I, Robert S. Mirin, Esquire, hereby certify that upon the date stated below, I served the attached PLAINTIFF'S OBJECTION TO DEFENDANT'S BILL OF COSTS upon the persons named below, at the stated addresses, by first class postage paid United States mail.

James A. McCall, Esquire
International Brotherhood of Teamsters
25 Louisiana Avenue, N.W.
Washington, D.C. 20001

Vincent Candiello, Esquire
MORGAN, LEWIS & BOCKIUS, L.L. P.
One Commerce Square
417 Walnut Street
Harrisburg, PA 17101-1904

Dated: February 25, 2004

By: /s/ Robert S. Mirin
Robert S. Mirin